HONORABLE MARSHA J. PECHMAN 1 2 3 4 5 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 6 AT SEATTLE 7 JOSHUA HILLS, individually and as the 8 Personal Representative of the ESTATE OF EDWARD LOWELL HILLS, 9 No. 3:19-cv-05634-MJP Plaintiff, 10 STIPULATED MOTION TO TAKE EXPERT DEPOSITION BEYOND THE **DISCOVERY CUTOFF** 11 v. MICHAEL J. GENTRY, an individual; and **Noted for Consideration:** 12 CITY OF FORKS, a Washington municipal **January 11, 2021** corporation, 13 14 Defendants. 15 On December 8, 2020, the parties filed an Amended Stipulated Motion to Continue Certain 16 Case Schedule Deadlines. (Dkt. 44.) On that same day, the Court issued its Order on Stipulated 17 Motion to Amend Case Schedule and set the discovery deadline to be completed by January 18, 18 2021. (Dkt. 45.) Defendants requested to take the depositions of plaintiff's disclosed experts. (Dkt. 19 44, 3:3-8; Coluccio Decl., Ex. A-C.) The parties have diligently worked to complete discovery by 20 January 18, 2021. (Coluccio, ¶3.) However, the deposition of plaintiff's expert, Norman Stamper, 21 STIPULATED MOTION TO TAKE EXPERT CHRISTIE LAW GROUP, PLLC DEPOSITION BEYOND THE DISCOVERY 2100 WESTLAKE AVENUE N., SUITE 206 CUTOFF-1 SEATTLE, WA 98109 (3:19-cv-05634-MJP) 206-957-9669

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1	disclosed on January 4, 2021, has been scheduled for January 20, 2021, based on his and the	
2	parties' availability. The parties seek permission	on from the Court to allow this deposition to occur
3	after the discovery cutoff deadline. (Id.)	
4	DATED this 11th day of January, 2021.	
5	DeLUE LAW PLLC	MULLIN, ALLEN & STEINER, PLLC
6	By /s/ Daniel DeLue Daniel DeLue, WSBA #29357	By /s/ Timothy E. Allen Timothy E. Allen
7	600 Stewart Street, Suite 1115 Seattle, WA 98101	101 Yesler Way, Suite 400 Seattle, WA 98104
8	Phone: 206-508-3804	Phone: 206-957-7007
	Email: ddd@d3law.com	Email: tallen@masattorneys.com
9	Attorney for Plaintiffs	Attorney for Plaintiffs
10	TURNER KUGLER LAW, PLLC	CHRISTIE LAW GROUP, PLLC
11	By /s/ John T. Kugler John T. Kugler, WSBA #19960	By /s/ Megan M. Coluccio Thomas P. Miller, WSBA #34473
12	6523 California Avenue SW, #454 Seattle, WA 98136	Megan M. Coluccio, WSBA #44178 2100 Westlake Avenue N., Suite 206
13	Phone: 206-659-0679 Email: john@turnerkuglerlaw.com	Seattle, WA 98109 Phone: 206-957-9669
14	Attorney for Defendant Michael Gentry	Email: tom@christielawgroup.com Email: megan@christielawgroup.com
15		Attorney for Defendant City of Forks
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STIPULATED MOTION TO TAKE EXPERT DEPOSITION BEYOND THE DISCOVERY CUTOFF- 2 (3:19-cv-05634-MJP)

CHRISTIE LAW GROUP, PLLC 2100 WESTLAKE AVENUE N., SUITE 206 SEATTLE, WA 98109 206-957-9669

1	ORDER	
2	THIS MATTER having come on regularly for hearing upon the stipulated motion of the	
3	parties above contained, and the Court being fully advised on the premises, now, therefore, it is	
4	hereby ORDERED that the following deposition may take place beyond the current discovery	
5	deadline of January 18, 2021:	
6	• Norman Stamper, Ph.D.	
7	DATED this 12th day of January, 2021.	
8		
9	Marshy Relens	
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11	HONORABLE MARSHA J. PECHMAN United States District Judge	
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